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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

*Plaintiff,*

v.

Traders Global Group Inc., a New Jersey  
corporation, d/b/a “My Forex Funds;”  
Traders Global Group Inc., a Canadian  
business organization; and Murtuza Kazmi,

*Defendants.*

**SUPPLEMENTAL DECLARATION  
OF ROBERT A. ZINK RE  
DEFENDANTS’ FEES AND COSTS  
ATTRIB. TO THE PROSECUTION  
OF MOTION FOR SANCTIONS**

Case No.: 1:23-cv-11808

Special Master: Hon. Jose L. Linares  
(Ret.)

District Judge: Hon. Edward S. Kiel

Magistrate Judge: Hon. Elizabeth A.  
Pascal

I, Robert A. Zink, declare pursuant 28 U.S.C. § 1746 as follows:

1. I respectfully submit this Supplemental Declaration pursuant to the Report and Recommendations of the Special Master dated April 30, 2025 (Dkt. 247), the District Court's Order adopting the Report and Recommendations dated May 13, 2025 (Dkt. 260), the Scheduling Order dated May 13, 2025 (Dkt. 255), Rule 54 of the Federal Rules of Civil Procedure, and Local Civil Rule 54.2.

2. In my Declaration dated May 16, 2025, I stated that Defendants anticipated filing a supplemental declaration for fees and costs incurred after March 31, 2025 attributable to the prosecution of the Motion for Sanctions. Dkt. 262 at 26 ¶ 43. On May 20, 2025, Defendants received notice that Plaintiff Commodity Futures Trading Commission ("CFTC") does not object to the fees and costs claimed in my May 16, 2025 Declaration. Dkt. 264. I now submit this Supplemental Declaration to account for the additional fees and costs attributable to the prosecution of the Motion for Sanctions that Traders Global Group, Inc. (a New Jersey corporation), Traders Global Group, Inc. (a Canadian business organization), and Murtuza Kazmi (collectively, "Defendants") incurred between April 1, 2025 and May 20, 2025.

3. I hereby incorporate by reference the contents of my May 16, 2025 Declaration to support Defendants' supplemental request for fees and costs incurred between April 1, 2025 and May 20, 2025.

**Quinn Emanuel**

4. Attached as **EXHIBIT A.** is a true and correct copy of billing records showing the Quinn Emanuel legal fees Defendants incurred between April 1, 2025 to May 20, 2025.<sup>1</sup> Quinn

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<sup>1</sup> Quinn Emanuel's invoice for April 2025 services issued on May 19, 2025; it has been submitted to the Canadian receiver for payment, and I expect it to be paid in the near future. Quinn Emanuel's invoice for May 2025 services has not yet issued; when the Quinn Emanuel

Emanuel charged Defendants a total of \$262,358.50 in fees for 162.5 hours of work during this period. As reflected in Mr. Speas's annotations to these records, the amount of Quinn Emanuel fees attributable to the prosecution of the Motion for Sanctions during this period is **\$148,273.75** for 93.2 hours of work. I personally reviewed Mr. Speas's calculations and agree that this is the amount of Quinn Emanuel fees attributable to the prosecution of the Motion for Sanctions between April 1, 2025 and May 20, 2025.

5. Between April 1, 2025 and May 20, 2025, Defendants incurred Quinn Emanuel legal fees for the following tasks attributable to the prosecution of the Motion for Sanctions:

- a. Analyzing the Special Master's Report and Recommendations regarding the Motion for Sanctions and the District Court's order adopting the same;
- b. Conferring with the CFTC regarding the Special Master's Report and Recommendations regarding the Motion for Sanctions and negotiating a related consent motion for a scheduling order;
- c. Analyzing the CFTC's proposed redactions to the Special Master's Report and Recommendations regarding the Motion for Sanctions and conferring with the CFTC regarding same;
- d. Analyzing the fees and costs attributable to the prosecution of the Motion for Sanctions that Defendants incurred in this case;

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invoice for May 2025 services issues, that invoice will also be submitted to the Canadian receiver for payment.

For ease of review, entries not attributable to the Motion for Sanctions have been redacted. Entries attributable to the Motion for Sanctions that reflect privileged information have been narrowly redacted for privilege. Defendants can provide unredacted copies of Quinn Emanuel's billing records for *in camera* review at the Court's request.

- e. Preparing my May 16, 2025 Declaration and supporting exhibits (totaling 355 pages) evidencing the fees and costs attributable to the prosecution of the Motion for Sanctions that Defendants incurred in this case through March 31, 2025; and
- f. Preparing this Supplemental Declaration and supporting exhibits evidencing the fees and costs attributable to the prosecution of the Motion for Sanctions that Defendants incurred between April 1, 2025 and May 20, 2025.<sup>2</sup>

6. Attached as **EXHIBIT B.** is a true and correct copy of billing records showing the Quinn Emanuel cost disbursements Defendants incurred between April 1, 2025 and May 20, 2025.<sup>3</sup> Quinn Emanuel charged Defendants a total of \$2,267.90 in cost disbursements during this period (excluding fees and costs charged by the Special Master). As reflected in Mr. Speas's annotations to these records, the amount of Quinn Emanuel cost disbursements attributable to the prosecution of the Motion for Sanctions is **\$240.12** during this period. I personally reviewed Mr. Speas's calculations and agree that this is the amount of Quinn Emanuel cost disbursements attributable to the prosecution of the Motion for Sanctions between April 1, 2025 and May 20, 2025, exclusive of the Special Master's fees and costs.

**King & Spalding**

7. Attached as **EXHIBIT C.** is a true and correct copy of billing records showing the King & Spalding legal fees Defendants incurred between April 1, 2025 and May 20, 2025.<sup>4</sup> King

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<sup>2</sup> “[T]he time expended by attorneys in obtaining a reasonable fee is justifiably included in the attorneys’ fee application, and in the court’s fee award.” *Prandini v. Nat’l Tea Co.*, 585 F.2d 47, 53 (3d Cir. 1978).

<sup>3</sup> One cost entry not attributable to the Motion for Sanctions included on Quinn Emanuel’s latest invoice has been redacted.

<sup>4</sup> King & Spalding’s invoice for services between April 1, 2025 and May 20, 2025 issued on May 21, 2025; it has been submitted to the Canadian receiver for payment, and I expect it to be paid in the near future.

& Spalding charged Defendants a total of \$27,249.50 in fees for 19.6 hours of work during this period. As reflected in Mr. Speas's annotations to these records, the amount of King & Spalding fees attributable to the prosecution of the Motion for Sanctions is **\$24,208.00** for 17.8 hours of work during this period. I personally reviewed Mr. Speas's calculations and agree that this is the amount of King & Spalding fees attributable to the prosecution of the Motion for Sanctions between April 1, 2025 and May 20, 2025.

8. Between April 1, 2025 and May 20, 2025, Defendants incurred King & Spalding legal fees for the following tasks attributable to the prosecution of the Motion for Sanctions:

- a. Analyzing the Special Master's Report and Recommendations regarding the Motion for Sanctions and the District Court's order adopting the same;
- b. Analyzing the CFTC's proposed redactions to the Special Master's Report and Recommendations regarding the Motion for Sanctions;
- c. Compiling relevant fee and cost records and assisting Quinn Emanuel in analyzing the fees and costs attributable to the prosecution of the Motion for Sanctions that Defendants incurred; and
- d. Assisting Quinn Emanuel in preparing the May 16, 2025 Declaration and supporting exhibits evidencing the fees and costs attributable to the prosecution of the Motion for Sanctions that Defendants incurred in this case through March 31, 2025.

9. Attached as **EXHIBIT D.** is a true and correct copy of billing records showing the King & Spalding cost disbursements Defendants incurred between April 1, 2025 and May 20,

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For ease of review, entries not attributable to the Motion for Sanctions have been redacted. Entries attributable to the Motion for Sanctions that reflect privileged information have been narrowly redacted for privilege. Defendants can provide unredacted copies of King & Spalding's billing records for *in camera* review at the Court's request.

2025. King & Spalding charged Defendants a total of \$52.50 in cost disbursements during this period. As reflected in Mr. Speas's annotations to these records, the amount of King & Spalding cost disbursements attributable to the prosecution of the Motion for Sanctions is **\$29.40** during this period. I personally reviewed Mr. Speas's calculations and agree that this is the amount of King & Spalding cost disbursements attributable to the prosecution of the Motion for Sanctions between April 1, 2025 and May 20, 2025.

**McCarter & English**

10. As of the date of this Supplemental Declaration, the Special Master's law firm, McCarter & English, has not issued invoices for fees or costs after March 31, 2025 in this matter.

11. At the outset of the Special Master's appointment, the District Court ordered that "for good cause shown, the special master may determine each parties' costs, which shall be proportional, in the special master's good faith estimation, to the services rendered with respect to each party or reasonably based on other factors the special master deems appropriate." Dkt. 122 at 2 ¶ 5.

12. For the reasons explained in the Special Master's Report and Recommendation and the District Court's order adopting the same (*See, e.g.*, Dkt. 247 at 40-41), Defendants respectfully request that the CFTC be held responsible for all of the Special Master's fees and costs attributable to the Motion for Sanctions incurred on or after April, 1, 2025, including fees and costs for:

- a. Preparing the Report and Recommendations regarding the Motion for Sanctions;
- b. Legal and factual research regarding the Motion for Sanctions;
- c. Analyzing and responding to correspondence from counsel regarding the Motion for Sanctions;
- d. Holding conferences with staff and Judge Kiel regarding the Motion for Sanctions;

- e. Legal and factual analysis regarding Defendants' request for fees and costs attributable to the prosecution of the Motion for Sanctions; and
- f. Preparing a Report and Recommendation regarding Defendants' request for fees and costs attributable to the prosecution of the Motion for Sanctions.

### **Summary**

13. Defendants incurred **\$172,751.27** in fees and costs attributable to the prosecution of the Motion for Sanctions between April 1, 2025 and May 20, 2025. Together with the \$2,954,504.20 in fees and costs attributable to the prosecution of the Motion for Sanctions that Defendants incurred through March 31, 2025, Defendants' total fees and costs attributable to the prosecution of the Motion for Sanctions from inception to date is **\$3,127,255.47**. This amount represents approximately 43% of the total fees and costs Defendants incurred in this case from inception to date. The tables below and on the next page summarize these calculations.

	Sep. 1, 2023- Mar. 31, 2025	Percentage Attrib. to Sanctions Mot.	Amt. Attrib. to Sanctions Mot.	Percentage Incurred by Defendants	Amt. Attrib. to Sanctions Mot. Incurred by Defendants (Sep. 1, 2023-Mar. 31, 2025)
<b><u>Quinn Emanuel</u></b>					
<u>Fees</u>	\$ 5,816,908.00	39%	\$ 2,265,688.95	100%	\$ 2,265,688.95
<u>Costs</u>	\$ 250,101.60	23%	\$ 58,709.18	100%	\$ 58,709.18
<b><u>King &amp; Spalding</u></b>					
<u>Fees</u>	\$ 878,853.00	53%	\$ 469,109.60	100%	\$ 469,109.60
<u>Costs</u>	\$ 13,214.55	60%	\$ 7,880.59	100%	\$ 7,880.59
<b><u>McCarter &amp; English</u></b>					
<u>Fees</u>	\$ 351,320.00	80%	\$ 281,736.25	50%	\$ 140,868.13
<u>Costs</u>	\$ 25,327.12	97%	\$ 24,495.52	50%	\$ 12,247.76
<b>SUB TOTAL</b>	<b>\$ 7,335,724.27</b>	<b>42%</b>	<b>\$ 3,107,620.09</b>		<b>\$ 2,954,504.20</b>

	Apr. 1, 2025-May 20, 2025	Percentage Attrib. to Sanctions Mot.	Amt. Attrib. to Sanctions Mot.	Percentage Incurred by Defendants	Amt. Attrib. to Sanctions Mot. Incurred by Defendants (Apr. 1, 2025-May 20, 2025)
<b><u>Quinn Emanuel</u></b>					
<u>Fees</u>	\$ 262,358.50	57%	\$ 148,273.75	100%	\$ 148,273.75
<u>Costs</u>	\$ 2,267.90	11%	\$ 240.12	100%	\$ 240.12
<b><u>King &amp; Spalding</u></b>					
<u>Fees</u>	\$ 27,249.50	89%	\$ 24,208.00	100%	\$ 24,208.00
<u>Costs</u>	\$ 52.50	56%	\$ 29.40	100%	\$ 29.40
<b>SUB TOTAL</b>	<b>\$ 291,928.40</b>	<b>59%</b>	<b>\$ 172,751.27</b>		<b>\$ 172,751.27</b>

		Percentage Attrib. to Sanctions Mot.	Amt. Attrib. to Sanctions Mot.	Percentage Incurred by Defendants	Amt. Attrib. to Sanctions Mot. Incurred by Defendants
<b><u>Quinn Emanuel</u></b>	All				
<u>Fees</u>	\$ 6,079,266.50	40%	\$ 2,413,962.70	100%	\$ 2,413,962.70
<u>Costs</u>	\$ 252,369.50	23%	\$ 58,949.30	100%	\$ 58,949.30
<b><u>King &amp; Spalding</u></b>					
<u>Fees</u>	\$ 906,102.50	54%	\$ 493,317.60	100%	\$ 493,317.60
<u>Costs</u>	\$ 13,267.05	60%	\$ 7,909.99	100%	\$ 7,909.99
<b><u>McCarter &amp; English</u></b>					
<u>Fees</u>	\$ 351,320.00	80%	\$ 281,736.25	50%	\$ 140,868.13
<u>Costs</u>	\$ 25,327.12	97%	\$ 24,495.52	50%	\$ 12,247.76
<b>GRAND TOTAL</b>	<b>\$ 7,627,652.67</b>	<b>43%</b>	<b>\$ 3,280,371.36</b>		<b>\$ 3,127,255.47</b>

14. For the reasons set forth in this Supplemental Declaration and my May 16, 2025 Declaration, pursuant to the Special Master's April 30, 2025 Report and Recommendations (Dkt. 247) adopted by the District Court on May 13, 2025 (Dkt. 260), Defendants respectfully request a fee and cost award of \$172,751.27 for services between April 1, 2025 and May 20, 2025, in addition to an award of \$2,954,504.20 for services through March 31, 2025, for a total fee and cost award of **\$3,127,255.47**. Defendants respectfully submit that this total amount is reasonable and an appropriate deterrent under the circumstances.

15. Defendants further request that the CFTC be held fully responsible for all of the Special Master's pending, future, and outstanding fees and costs attributable to the Motion for Sanctions.

16. I declare under the penalty of perjury that the foregoing statements are true and correct. Executed in Washington, D.C. on May 23, 2025.




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Robert A. Zink



# EXHIBIT A

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

<b>Work Date</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Percentage of Hours Attributable to Sanctions Motion</b>	<b>Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)</b>	<b>Fees Attributable to Pros. of Sanctions Mot.</b>
4/1/2025	0.20	1,465.00	293.00	Dakota Skyler Speas	[Not. Attrib. to Sanctions Mot.]			
4/3/2025	0.60	1,465.00	879.00	Dakota Skyler Speas				
4/3/2025	0.50	1,810.00	905.00	Robert Zink				
4/8/2025	0.40	1,735.00	694.00	Kurt Wolfe				
4/10/2025	2.30	1,735.00	3,990.50	Kurt Wolfe				
4/14/2025	2.10	1,810.00	3,801.00	Robert Zink				
4/14/2025	0.20	940.00	188.00	Juliette Turner-Jones				
4/15/2025	1.60	1,735.00	2,776.00	Kurt Wolfe				
4/16/2025	3.90	1,735.00	6,766.50	Kurt Wolfe				
4/22/2025	0.20	1,735.00	347.00	Kurt Wolfe				
4/23/2025	0.20	1,735.00	347.00	Kurt Wolfe				
4/23/2025	0.20	940.00	188.00	Juliette Turner-Jones				
4/24/2025	0.80	1,735.00	1,388.00	Kurt Wolfe				
4/24/2025	0.80	940.00	752.00	Juliette Turner-Jones				
4/28/2025	1.90	940.00	1,786.00	Juliette Turner-Jones				

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

<b>Work Date</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Percentage of Hours Attributable to Sanctions Motion</b>	<b>Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)</b>	<b>Fees Attributable to Pros. of Sanctions Mot.</b>
4/29/2025	0.10	1,465.00	146.50	Dakota Skyler Speas	[Not. Attrib. to Sanctions Mot.]			
4/29/2025	1.50	1,810.00	2,715.00	Robert Zink				
4/29/2025	2.70	940.00	2,538.00	Juliette Turner-Jones				
4/30/2025	4.50	1,810.00	8,145.00	Benjamin Finestone				
4/30/2025	1.10	940.00	1,034.00	Juliette Turner-Jones				
5/1/2025	1.90	1,465.00	2,783.50	Dakota Skyler Speas	Analyze Report & Recommendation re sanctions motion and motion to dismiss; confer with team and client re same.	100%	1.9	\$ 2,783.50
5/1/2025	1.50	2,410.00	3,615.00	Alex Spiro	Decision and internal discussions.	100%	1.5	\$ 3,615.00
5/1/2025	0.20	1,735.00	347.00	Kurt Wolfe	Attention to correspondence regarding Linares' recommendations on sanctions motion.	100%	0.2	\$ 347.00
5/1/2025	2.30	1,810.00	4,163.00	Robert Zink	Review Report & Recommendation and discuss implications with client (2.3 hrs)	100%	2.3	\$ 4,163.00
5/1/2025	0.50	1,735.00	867.50	Avi Perry	Review decision, and calls with team regarding same.	100%	0.5	\$ 867.50
5/5/2025	1.30	1,465.00	1,904.50	Dakota Skyler Speas	Confer with billing staff re billing records; confer with team and client re fee affidavit preparation and case status.	100%	1.3	\$ 1,904.50
5/5/2025	0.70	1,735.00	1,214.50	Kurt Wolfe	Correspond regarding CFTC filing, unsealing; correspond with DS regarding fees motion; correspond with RZ, AP [Privileged] [REDACTED].	50%	0.4	\$ 607.25
5/6/2025	2.00	1,465.00	2,930.00	Dakota Skyler Speas	Confer with team re preparation of fee affidavit; prepare same; conduct	100%	2.0	\$ 2,930.00

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

Work Date	Hours	Rate	Amount	Timekeeper	Narrative	Percentage of Hours Attributable to Sanctions Motion	Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)	Fees Attributable to Pros. of Sanctions Mot.
					legal research re same; confer with M. Kazmi re sanctions report & recommendation.			
5/6/2025	3.50	1,645.00	5,757.50	Daniel Koffmann	[Not. Attrib. to Sanctions Mot.] [REDACTED] [REDACTED]			
5/6/2025	0.20	1,735.00	347.00	Kurt Wolfe	[Not. Attrib. to Sanctions Mot.] [REDACTED]			
5/6/2025	5.60	1,810.00	10,136.00	Robert Zink	Review relevant CFTC filing and press release; discuss implications with client; research [Privileged] [REDACTED]	50%	2.8	\$ 5,068.00
5/7/2025	5.00	1,465.00	7,325.00	Dakota Skyler Speas	Analyze billing records and docket and prepare fee affidavit.	100%	5.0	\$ 7,325.00
5/7/2025	0.20	1,735.00	347.00	Kurt Wolfe	[Not. Attrib. to Sanctions Mot.] [REDACTED]			
5/8/2025	4.60	1,465.00	6,739.00	Dakota Skyler Speas	Analyze billing records and docket and prepare fee affidavit; analyze proposed CFTC redactions to R&R and confer with team and client re same; analyze CFTC proposed scheduling order and confer with team re same.	100%	4.6	\$ 6,739.00
5/8/2025	7.20	1,645.00	11,844.00	Daniel Koffmann	[Not. Attrib. to Sanctions Mot.] [REDACTED]			
5/8/2025	0.20	1,735.00	347.00	Kurt Wolfe	Correspondence regarding strategy for fees motion.	100%	0.2	\$ 347.00
5/8/2025	2.30	1,810.00	4,163.00	Robert Zink	Research law [Privileged] [REDACTED]	100%	2.3	\$ 4,163.00
5/9/2025	5.30	1,465.00	7,764.50	Dakota Skyler Speas	Confer with R. Zink re case strategy; confer with team re scheduling order and redactions; prepare fee affidavit, analyze billing records, and confer with team re same.	100%	5.3	\$ 7,764.50

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

Work Date	Hours	Rate	Amount	Timekeeper	Narrative	Percentage of Hours Attributable to Sanctions Motion	Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)	Fees Attributable to Pros. of Sanctions Mot.
5/9/2025	2.90	1,645.00	4,770.50	Daniel Koffmann	[Not. Attrib. to Sanctions Mot.] [Redacted]			
5/9/2025	0.40	1,735.00	694.00	Kurt Wolfe	Review and correspond regarding scheduling order, fees affidavit.	100%	0.4	\$ 694.00
5/9/2025	4.60	1,810.00	8,326.00	Robert Zink	Participate in call with CFTC to discuss scheduling order and other matters; conduct follow-up.	100%	4.6	\$ 8,326.00
5/9/2025	0.60	1,735.00	1,041.00	Avi Perry	Call with client; calls with CFTC and co-counsel; emails [Privileged] [Redacted]	80%	0.5	\$ 832.80
5/11/2025	0.10	1,465.00	146.50	Dakota Skyler Speas	Confer with accounting staff re backup for fee affidavit.	100%	0.1	\$ 146.50
5/12/2025	1.20	1,465.00	1,758.00	Dakota Skyler Speas	Confer with team, client, and CFTC re redactions to proposed order; revise same.	100%	1.2	\$ 1,758.00
5/12/2025	1.50	1,735.00	2,602.50	Kurt Wolfe	Prepare for and strategy call with QE, K&S team ; corr with CFTC regarding scheduling order.	100%	1.5	\$ 2,602.50
5/12/2025	5.70	1,810.00	10,317.00	Robert Zink	[Not. Attrib. to Sanctions Mot.] [Redacted]			
5/12/2025	0.50	1,735.00	867.50	Avi Perry	Call with co-counsel.	100%	0.5	\$ 867.50
5/13/2025	5.60	1,465.00	8,204.00	Dakota Skyler Speas	Confer with R. Zink, A. Rose, and H. Kellett [Privileged] [Redacted]; confer with CFTC re redactions order; review court orders re redactions and scheduling; confer with T. Scrivo re fee affidavit and prepare same; review correspondence [Privileged] [Redacted]; review and revise [Privileged] [Redacted].	70%	3.9	\$ 5,742.80
5/13/2025	5.90	1,735.00	10,236.50	Kurt Wolfe	Prepare [Privileged] [Redacted];	20%	1.2	\$ 2,047.30

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

Work Date	Hours	Rate	Amount	Timekeeper	Narrative	Percentage of Hours Attributable to Sanctions Motion	Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)	Fees Attributable to Pros. of Sanctions Mot.
					prepare [Privileged]; correspondence with CFTC regarding scheduling order, redactions; review unredacted filings; correspondence with Stikeman [Privileged]; confer with RZ [Privileged].			
5/13/2025	3.30	1,810.00	5,973.00	Robert Zink	[Not. Attrib. to Sanctions Mot.]			
5/14/2025	9.70	1,465.00	14,210.50	Dakota Skyler Speas	Analyze billing records, prepare fee affidavit, and confer with team and client re same; review court order adopting report and recommendation re sanctions and confer with team re same; review correspondence [Privileged].	90%	8.7	\$ 12,789.45
5/14/2025	5.00	1,735.00	8,675.00	Kurt Wolfe	Correspondence [Privileged]; correspond [Privileged]; correspond [Privileged]; correspond with QE, K&S teams regarding strategy, next steps; review draft affidavit in support of fees application; correspond with DS regarding same; correspond with M. Kazmi [Privileged].	20%	1.0	\$ 1,735.00
5/14/2025	0.40	1,810.00	724.00	Robert Zink	Discuss fee affidavit with team members.	100%	0.4	\$ 724.00
5/14/2025	0.80	1,735.00	1,388.00	Avi Perry	[Not. Attrib. to Sanctions Mot.]			
5/15/2025	5.70	1,465.00	8,350.50	Dakota Skyler Speas	Prepare fee affidavit and confer with team re same.	100%	5.7	\$ 8,350.50

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

Work Date	Hours	Rate	Amount	Timekeeper	Narrative	Percentage of Hours Attributable to Sanctions Motion	Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)	Fees Attributable to Pros. of Sanctions Mot.
5/15/2025	6.70	1,735.00	11,624.50	Kurt Wolfe	Prepare [Privileged]; correspond with QE and K&S teams [Privileged]; research [Privileged]; prepare and circulate email memorandum summarizing legal research; review and revise draft fees application; strategy conference with DS regarding same.	50%	3.4	\$ 5,812.25
5/15/2025	6.80	1,810.00	12,308.00	Robert Zink	Review of fee affidavit materials and back-up	100%	6.8	\$ 12,308.00
5/16/2025	11.80	1,465.00	17,287.00	Dakota Skyler Speas	Finalize and file fee affidavit and supporting exhibits and confer with team and client re same.	100%	11.8	\$ 17,287.00
5/16/2025	0.50	620.00	310.00	Anthony Staltari	Review and revise declaration in support of fees and costs	100%	0.5	\$ 310.00
5/16/2025	1.80	1,735.00	3,123.00	Kurt Wolfe	[Privileged]; correspond with QE, K&S, [Privileged]; review and revise draft fees affidavit.	50%	0.9	\$ 1,561.50
5/19/2025	0.10	1,465.00	146.50	Dakota Skyler Speas	Review District Court referral of fee assessment to Special Master.	100%	0.1	\$ 146.50
5/20/2025	2.40	1,465.00	3,516.00	Dakota Skyler Speas	Analyze CFTC response to fee affidavit and confer with M. Kazmi and R. Zink re same; confer with team re preparation of supplemental affidavit; confer with H. Kellett [Privileged]; prepare supplemental affidavit.	90%	2.2	\$ 3,164.40
5/20/2025	0.40	1,735.00	694.00	Kurt Wolfe	[Not. Attrib. to Sanctions Mot.]			
5/20/2025	0.20	1,735.00	347.00	Avi Perry	[Not. Attrib. to Sanctions Mot.]			

**EXHIBIT A – SUPPLEMENTAL QUINN EMANUEL LEGAL FEES**

<b>Work Date</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Percentage of Hours Attributable to Sanctions Motion</b>	<b>Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)</b>	<b>Fees Attributable to Pros. of Sanctions Mot.</b>
	<b>162.5</b>		<b>\$262,358.50</b>				<b>93.2</b>	<b>\$148,273.75</b>
	Total Hours (Apr. 1-May 20)		Total Fees (Apr. 1-May 20)				Hours Attrib. to Sanctions Mot. (Apr. 1-May 20)	Fees Attrib. to Sanctions Mot. (Apr. 1-May 20)



# **EXHIBIT B**

**EXHIBIT B – SUPPLEMENTAL QUINN EMANUEL COST DISBURSEMENTS**

<b>Cost Type</b>	<b>Work Date</b>	<b>Quantity</b>	<b>Amount</b>	<b>Narrative</b>	<b>Percentage of Cost Attributable to Sanctions Motion</b>	<b>Cost Attributable to Pros. of Sanctions Mot.</b>
Telephone	3/10/2025	1.00	\$9.64	[Not. Attrib. to Sanctions Mot.] [REDACTED] [REDACTED] [REDACTED]		
Professional services - Other	3/31/2025	1.00	\$12,030.00	McCARTER & ENGLISH, LLP - #12380-00001/Special Masters for professional services rendered through 03/31/25.	Already claimed in May 16, 2025 Declaration	
PACER Services	4/1/2025	1.00	\$397.10	U.S. Courts: PACER - Legal Research Charges from [insert date range] - Account # [insert account]	60.0%	\$ 238.26
RelOne Cold Storage Hosting (Per GB)	4/2/2025	930.58	\$1,861.16	RelOne Active Hosting (Per GB)	0.1%	\$ 1.86
			\$14,297.90	<b>\$ 2,267.90</b>		<b>\$ 240.12</b>
			Total Costs (Apr. 1-May 20)	Less Special Master		Costs Attributable to Sanctions Mot. (Apr. 1-May 20)

# EXHIBIT C

**EXHIBIT C – SUPPLEMENTAL KING & SPALDING LEGAL FEES**

Date	Timekeeper	Hours	Rate	Amount	Narrative	Percentage of Hours Attributable to Sanctions Motion	Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)	Fees Attributable to Pros. of Sanctions Mot.
4/8/2025	C Carpenito	0.2	1700.00	340.00	[Not. Attrib. to Sanctions Mot.]			
4/10/2025	C Carpenito	0.1	1700.00	170.00				
4/29/2025	C Carpenito	0.1	1700.00	170.00				
4/30/2025	C Carpenito	0.1	1700.00	170.00				
5/1/2025	C Carpenito	2.0	1700.00	3400.00	Review and analyze report and recommendation; related communications with client, Quinn team and TJ.Scrivo	100%	2.0	\$ 3,400.00
5/2/2025	C Carpenito	0.9	1700.00	1530.00	Communications with client, Quinn and TJ.Scrivo re: report and recommendation of special master; further review of report	100%	0.9	\$ 1,530.00
5/2/2025	C Splaine	0.1	665.00	66.50	[Not. Attrib. to Sanctions Mot.]			
5/2/2025	T Scrivo	1.3	1160.00	1508.00	Review report and recommendation of special master; correspondence with C. Carpenito re same	100%	1.3	\$ 1,508.00
5/5/2025	C Carpenito	0.3	1700.00	510.00	Call with R.Zink re: strategy	100%	0.3	\$ 510.00
5/5/2025	C Splain	0.2	665.00	133.00	Review of court notice of disclosure of information in sealed Report & Recommendation and advise team	100%	0.2	\$ 133.00
5/8/2025	C Carpenito	0.2	1700.00	340.00	Discuss strategy with R.Zink	100%	0.2	\$ 340.00
5/9/2025	C Carpenito	1.1	1700.00	1870.00	Attention to report and recommendation; negotiations with CFTC re: terms of redactions and unsealing; communications with Quinn and the CFTC re: same	100%	1.1	\$ 1,870.00
5/12/2025	C Carpenito	1.1	1700.00	1870.00	Review proposed order and redactions; communications with	100%	1.1	\$ 1,870.00

**EXHIBIT C – SUPPLEMENTAL KING & SPALDING LEGAL FEES**

Date	Timekeeper	Hours	Rate	Amount	Narrative	Percentage of Hours Attributable to Sanctions Motion	Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)	Fees Attributable to Pros. of Sanctions Mot.
					Quinn and CFTC re: same; attention to numerous filings and redacted order; related e-mails			
5/13/2025	C Carpenito	2.0	1700.00	3400.00	Strategy call with R.Zink; attention to correspondence and numerous filings; review unsealed redacted report; communications with Quinn [Privileged]; [Privileged]; [Privileged]	50%	1.0	\$ 1,700.00
5/13/2025	C Splaine	0.2	665.00	133.00	Review of court notice and order granting sealing of Report & Recommendation and setting requirements for redacted public version to be filed by parties	100%	0.2	\$ 133.00
5/13/2025	T Scrivo	1.1	1160.00	1276.00	Correspondence with QE re fee affidavit; Gather billing information from finance department as support	100%	1.1	\$ 1,276.00
5/14/2025	C Splaine	0.2	665.00	133.00	Review of court Orders entered by Judge Kiel including adopting the Special Master's Report & Recommendation granting the sanctions motion and dismissing the complaint and setting deadline for Defendants to submit affidavit of fees and costs incurred in sanctions motion and advise team regarding case deadlines	100%	0.2	\$ 133.00
5/14/2025	T Scrivo	1.7	1160.00	1972.00	Review fee schedule and affidavit/ Correspondence with QE re same	100%	1.7	\$ 1,972.00
5/15/2025	C Carpenito	0.5	1700.00	850.00	Attention to [Privileged] fee affidavit	50%	0.3	\$ 425.00

**EXHIBIT C – SUPPLEMENTAL KING & SPALDING LEGAL FEES**

<b>Date</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	<b>Narrative</b>	<b>Percentage of Hours Attributable to Sanctions Motion</b>	<b>Hours Attributable to Pros. of Sanctions Mot. (rounded to nearest tenth)</b>	<b>Fees Attributable to Pros. of Sanctions Mot.</b>
5/15/2025	T Scrivo	3.6	1160.00	4176.00	Review and edit K&S section of fee affidavit; Correspondence with QE re same	100%	3.6	\$ 4,176.00
5/16/2025	C Carpenito	0.4	1700.00	680.00	Communications with TJ.Scrivo re: fee submission	100%	0.4	\$ 680.00
5/16/2025	T Scrivo	2.2	1160.00	2552.00	Correspondence with QE re fee affidavit; correspondence with C. Carpenito re same ; review and edit fee affidavit	100%	2.2	\$ 2,552.00
		<b>19.6</b>		<b>\$ 27,249.50</b>			<b>17.8</b>	<b>\$ 24,208.00</b>
		Total Hours (Apr. 1- May 20)		Total Fees (Apr. 1-May 20)			Hours Attrib. to Sanctions Mot. (Apr. 1-May 20)	Fees Attrib. to Sanctions Mot. (Apr. 1-May 20)

# EXHIBIT D

**EXHIBIT D – SUPPLEMENTAL KING & SPALDING COST DISBURSEMENTS**

<b>Cost Type</b>	<b>Invoice Date</b>	<b>Amount</b>	<b>Percentage of Cost Attributable to Sanctions Motion</b>	<b>Cost Attributable to Pros. of Sanctions Mot.</b>
Document Retrieval	5/21/2025	\$ 7.80	56%	\$ 4.37
Litigation Support Vendors	5/21/2025	\$ 44.70	56%	\$ 25.03
		\$ 52.50		<b>\$ 29.40</b>
		Total Costs (Apr. 1-May 20)		Costs Attributable to Sanctions Mot. (Apr. 1-May 20)



**CERTIFICATE OF SERVICE**

ANTHONY J. STALTARI, hereby certifies pursuant to 28 U.S.C. § 1746 that on this date, I filed the aforementioned document with the CM/ECF system for the U.S. District Court for the District of New Jersey, thereby effectuating service upon all counsel of record via electronic means.

I certify under the penalty of perjury that the foregoing statements are true and correct.  
Executed in New York, New York on May 23, 2025.

/s/ Anthony J. Staltari

Anthony J. Staltari